

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-CR-20341-ALTMAN

UNITED STATES OF AMERICA

vs.

ROLANDO RAMIREZ,
RASHEED ALI, and
TAMRAT MASON.

Defendants.

GOVERNMENT'S SUPPLEMENTAL NOTICE OF INTENT
TO RELY ON EVIDENCE PURSUANT TO FRE 404(b)

The United States of America files this *Supplemental Notice of Intent to Rely on Evidence Pursuant to F.R.E. 404(b)(3)(B)*, requiring the Government to articulate the permitted purpose(s) of the evidence and the reasoning that supports the purpose(s):

The evidence outlined in Section I, II and III of the notice is offered to prove motive, intent, preparation, plan, knowledge, and identity. Specifically, as to Sections I and II, threats against a witness are evidence of consciousness of guilt (which encompasses the permitted uses) and Rule 404(b) applies. As to Section III, RAMIREZ's statements demonstrate RAMIREZ knowledge surrounding what it takes to commit the crime and his willingness and intent to do so, how he would plan and prepare the crime, all of which identifies him as having committed the crime.

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By: /s/ Michael E. Gilfarb

Michael E. Gilfarb
Assistant United States Attorney
Fla. Bar. No. 957836
99 N.E. 4th Street
Miami, FL 33132-2111

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 25, 2025, I served a copy upon all counsel of record using CM/ECF.

By: s/Michael E. Gilfarb
Michael E. Gilfarb
Assistant United States Attorney